



VALIOTIS & ASSOCIATES PLLC
ATTORNEYS AT LAW

June 2, 2021

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/3/2021

VIA ECF

Judge Analisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Alexander Gomez v. Tra Di Noi, Corp. and 622 East 187th Street, LLC*
Docket No. 1:21-cv-03122-AT

Judge Torres:

We represent Defendant 622 East 187th Street, LLC ("622 East 187") in the above referenced matter. We respectfully make this Letter-Motion for two issues.

First, to request a 30-day extension of time to file an answer to the complaint. The complaint in this matter was served on 622 East 187 through the New York Department of State on April 27, 2021. However our firm was only recently retained and we just received the complaint today. Therefore, we respectfully request a 30-day extension of time so that we may properly review the complaint, discuss same our client, and submit an appropriate response. This is 622 East 187's first request for an extension of time and Plaintiff's counsel, Gabriel Levy, Esq., has consented to our request.

Second, to request an adjournment of the Initial Pretrial Conference, which is currently scheduled for June 15, 2021 at 10:00 a.m. We respectfully request that the conference be adjourned to a time in late July to allow 622 East 187 time to serve its answer and to allow the parties time to prepare and submit a joint letter prior to the conference. Again, this is 622 East 187's first request for an adjournment and Mr. Levy has consented to our request.

If you have any questions, please do not hesitate to contact me.

GRANTED. Defendants' request for a 30-day extension of time to answer or otherwise respond to the complaint is GRANTED. The conference scheduled for June 15, 2021, is ADJOURNED to **July 22, 2021, at 10:40 a.m.** By **July 15, 2021**, the parties shall submit their joint letter and proposed case management plan.

Sincerely,

Katie L. Bireley

SO ORDERED.

Dated: June 3, 2021
New York, New York

ANALISA TORRES
United States District Judge

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